

FULL NAME	DUTY TO COOPERATE	LEGALLY COMPLIANT	SOUND	WHICH PART	WHICH PARAGRAPHS	WHICH POLICY	WHICH POLICY MAP	WHICH DIAGRAM	WHICH TABLE
Mr Dylan Coles	No	Yes	No	Paragraph, Policy, Policies Map, Table	P42-50, P178-200	Environment Policies P178-P200	Polices Map 1		Table 10 Provisions Standard P194-195

WHY PLAN NOT SOUND	MODIFICATIONS	HEARINGS	HEARING SESSIONS
<p>Charnwood Local Plan Pre-Submission Stage Sustainability Appraisal (2021) P84 notes “7.2.11...the sites allocated between Nanpantan and Woodthorpe could affect the landscape character in and around Charnwood Forest in areas of moderate and moderate-high landscape sensitivity. 7.2.12 Allocating large sites in areas that are currently open landscape is likely to have negative effects.” However, the Sustainability Report, appear to under estimate the impact of development in this area. Furthermore, the Charnwood Local Plan has a far larger development in the South and South West of Loughborough (HA15, HA16, HA17, P42 to P48 of the Charnwood Plan over 1300 dwellings) than was considered in the Sustainability Report (300- 700 dwellings). The size of development proposed in the Charnwood Plan in this area would certainly constitute a significant negative effect on the area in terms of its sensitive landscape and biodiversity and has not been reviewed properly. There is a lack of sound decision making regarding specific development in HA15, HA16, HA17 and there is not a rigorous application of the Sustainability Report to the Charnwood Plan. The Charnwood Plan with regards HA15, HA16, HA17 is not in keeping with the Sustainability criteria of the National Planning Policy Framework (NPPF) 2021. Furthermore, the Charnwood Plan is not applying Sustainability Criteria rigorously to the development. Currently the plans are not justified in light of NPPF (2021) criteria and so are not deliverable.</p> <p>P48 in the Charnwood Plan, the LSEP does not make sufficient amendments to accommodate wildlife and is too close to ancient woodland. LSEP needs amendment to put greater distance between the development and the ancient woodland, so to be sound and justified in terms of sustainability criteria of the NPPF (2021).</p> <p>P48 Area HA18 does not take significant account of the environmental impact and wildlife damage, neither does it take account of the significant negative impact of housing development to the aesthetics and beauty of the site. There is limited open space in this area, and this area should not be considered for development if sustainability criteria are to be met. The Charnwood Local Plan shows a lack of cooperation with residents regarding concerns in many areas.</p> <p>The Sustainability Report whilst discounting development made entirely of a new development due to time taken to develop, the needed development in Charnwood could be made partially via a new settlement development along with a reduced version of the Charnwood Plan. Developments onto existing settlements such as Loughborough would bring in needed development in the early years, and a new separate development would provide housing stock later on. Indeed, earlier consultations showed a preference for a new separate development – therefore this Charnwood Local Plan shows a lack of cooperation and negotiation with the local community. The advantage of a new development, if carefully chosen, would be minimise landscape, geodiversity and biodiversity degradation that the Charnwood Local Plan would bring to existing settlements.</p> <p>The attached document Commentary on Charnwood Local Plan Environment Policies (P178 – P200). Gives an overview of how on the surface the plan has environment policies, but there is a lack of rigour and detail. Currently these policies, whilst a start, are not sufficient or justified in light of the NPPF (2021) and do not consider sufficiently the damage to areas of natural beauty and biodiversity. The Charnwood Local Plan, if it was to raise itself properly to the sustainability criteria within the NPPF (2021), is not deliverable in its current form. The plan needs to be changed so that development is partially fulfilled via a new settlement and reduction in the planned expansion to existing areas. Change in Environment Policies would also require greater protection of Green Spaces such as Green Wedges and spaces between settlements.</p>	<p>There should be a general decrease in expansion of development in existing settlements, due to the degradation on Landscape and Biodiversity and a more moderate development around existing communities across the Charnwood Local and to include, including a significant reduction in the developments in HA15, HA16, HA17, HA18 (HA16, HA17, HA18 to be removed from the Charnwood Local Plan and HA15 reduced to 450 housing allocation in the line with the median of the Sustainability report to negate significant negative effects on the area p44 to 48). P49 in the Charnwood Plan, the LSEP should be amended to make greater distance between the development and the ancient woodland, so to be sound in terms of sustainability. Alongside this reduction this can be offset with a modest new development – and a new sustainability report undertaken to look at this, as well as reviewing the existing Sustainability report. More generally, the criteria for sustainability should be more consistently and rigorously applied to the Charnwood Plan and it should look more carefully at its own data.</p> <p>The Environment Policies (p178-p200) need to go further in protect the landscape and habitat, so that they are in line with the NPPF (2021). Applying sustainability criteria properly to the areas proposed in the Charnwood Local Plan would mean that a number of these areas would need to be reduced in scope or discounted entirely. Therefore, the plan as envisioned is not deliverable in a sustainable manner.</p>	No	

P178 to 200 Commentary on Charnwood Local Plan Environment Policies

We are living in a time where the impact of decades of environmental damage and degradation is showing itself with devastating impact on the globe. The environmental degradation has also been having a slow and detrimental effect on the well-being and enjoyment of Charnwood residents and communities over these decades. What is needed locally is a strong set of protective policies to conserve existing landscapes, forests, natural environments and open spaces and proactive restoration to drive to maintain, repair and enhance existing landscapes, forests, natural environments in both quantity and quality. This would fit with the Sustainability Criteria of the National Planning Policy Framework (2021). Unfortunately, the proposed Environment Policies EV1 to EV12 (p178 to 200) allow for significant further degradation against international, national and local policies through poorly defined exceptional circumstances, weak proposals for mitigating damage to the existing environment and vague and limited proposals for reversing decades of damage. There are 4 crucial areas that need improving in the environment policy and its application:

1. Far stronger protections of existing natural environments, landscape, beauty, forests, waterways, open spaces, green wedges and so forth
2. Details of the conditions that would disqualify development across Charnwood. Currently conditions that would mean support for development are detailed but red lines are not drawn for what would stop development.
3. A far more assertive policy for proactively regaining lost environment and expanding forest and so forth.
4. Remove and reduced proposed developments that are in breach of sustainability criteria.

Below gives some more details of areas that need change in the plan:

The introductory page (p.178) details the significance and importance in 8.1 to 8.5 of the natural environment to the well-being of the community, however, this weight and import is not reflected in the subsequent policies. 8.6 appears lacks clarity and necessary drivers for change.

P180 Policy EV1 Landscape – lacks detail on how the landscape will be protected. This policy is extremely limited and does not afford the significance given to it in the introduction of Chapter 8

P181 Policy EV2 Green Wedges. Green wedges could form an important, though limited aspect of conservation of the area, however, they are not afforded significant protection and instead the policies give broad conditions as to when green wedges can be eroded. There needs to be far stronger protection of Green Wedges

P182 Policy EV3 Areas of Local Separation. Again there needs to be far greater protection of Areas of Local Separation.

P184 Policy EV4 Charnwood Forest and National Forest. This policy is concerning as it does not offer sufficient protection against erosion and overdevelopment. In fact, the landscape in South and South West Loughborough overlooking the Charnwood Forest plans to be extensively developed. Neither does it detail sufficiently how the area can be restored and the natural environment expanded, following depletion over decades. The policy gives conditions required to develop on this area, however, it does not give conditions/ red lines for preventing developments on this unique and important area of Charnwood. The current draft policy leaves Charnwood Forest and National Forest open to exploitation and over development and the policy needs to reflect far greater protection and drivers for restoration of this area, including the landscape and biodiversity adjacent to it.

P185 Policy EV5 similar to the comments on Policy EV4 the policy does not offer sufficient protections against overdevelopment and does not detail criteria for what would stop development from occurring. It does not specify the drivers for protection and restoration.

P186 Point 8.39 recognises the significant loss of habitat in the area, however, does not offer sufficient protection or drivers for restoration. Indeed point 8.38 lays out circumstances where valuable trees and habitats can be destroyed and puts in weak mitigation and compensation for the loss of mature trees. Point 8.40 speaks of “limiting damage” however this should be reversing damage and restoring the environment.

P 186 – 187 Policy EV6 Conserving and Enhancing Biodiversity and Geodiversity. It is positive that a target for net gain is being made, however, the target appears to low given the loss over decades locally. What are the standards that will be used to monitor this? Further more it is very worrying that the policy allows for development which harms international, national and local biodiversity and geodiversity sites and also Charnwood priority habitats and species, the conditions for allowing this are far too broad and would allow development on incredibly sensitive and irreplaceable parts of Charnwood. The criteria for allowing development should set a far higher bar and far more protective of these important and unique aspects of Charnwood.

P190 p 189 to 190 Policy EV7 Tree Planting. There is not an equivalence between mature trees to 3 new ones, the time taken to grow mature trees, the connection to the landscape and the human relation to these trees cannot simply be replaced by 3 new trees. The policy needs far more robust protection of mature trees. There also needs to be a clear target and driver for planting of new trees above and beyond existing trees. Maintenance of current trees should be a priority, with expansion on top of this.

P194 -195 Table 10 Provision standards. The standard are insufficient to make up for loss over decades. Some areas have no targets at all and this needs to be rectified.

P199 Policy EV11 only looks to maintain current air quality and does not seek to improve current levels.